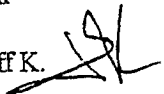


(A)

To: Loren

From: Jeff K. 

Date: March 2, 1997

Subject: ERPP Review

As you requested, I reviewed the subject document in an effort to anticipate stakeholder (water supply community) comments. I believe that as written, the document would likely elicit the following reactions from water users. I have also included my major editorial observations and suggestions. Specific comments and suggestions are marked in my copy of the document.

Overall Thrust and Direction - These are several big picture items that strike at the heart of the ERPP. However CALFED chooses to go, a carefully written introduction to the ERPP addressing these issues may be helpful.

***The ERPP Is Not An Integrated Package** - The ERPP presents an enormous "wish list" of actions, but there is no process for prioritizing or selecting actions to be implemented. The ERPP seems to suggest that all actions are needed to achieve the CALFED objectives. If so, there is no offer of proof for this premise. On the other hand, aren't some actions much more critical than others? In fact, aren't some actions dependent on other actions to be effective? Not clear how the pieces fit together.*

***The ERPP Over-Reaches the CALFED Mandate** - The CALFED objectives refer specifically to improvements in the estuary itself. Most of the actions in the ERPP are outside the Delta, aimed apparently at CALFED objective ~~7C~~ **Increase Population Health and Size of Delta Species**. There should be a guiding framework; e.g. make the Delta a safe place for fish, then if still needed, increase populations elsewhere... Demand reductions and export restriction pop up out of nowhere in the Delta section of Volume 1, are these things really part of the ERPP?*

***The ERPP Creates New CALFED Objectives** - Numerous baselines are included in the ERPP, e.g. delist Winter Run, return Striped Bass to 1960's population levels, flows restored to pre-export patterns, etc... The CALFED mission, as advertised, was to carefully narrow the problem scope to the Delta itself, the solution was to eliminate the Delta as a limiting factor in species health, other factors might remain to threaten certain species, but those are beyond CALFED control. The ERPP seeks to solve the species problem, not just the Delta problem.*

***Sections Discussing Flows Read Like An EDF Members' Handbook** - Background sections on flows need to be revised to clear up rhetoric and soften language. Relationship between the ERPP and the AFR, B2 water, and DFG program is unclear. It's as if the AFRP never happened, or is being paid lip service then tossed aside. The answer for everything is more water, recent FERC settlements (e.g. EBMUD, SFPUC) are ignored. Sore spots like Lodi Dam and the Calaveras River are reopened. These issues were painfully discussed during AFRP, why bring them up again? Statements like "additional flows will be released only when corresponding inflows are present" are simplistic and explosive at best. Similarly, references to the Mokelumne and Hetch Hetchy Aqueducts suggest that EBMUD and SFPUC are the only users of the Mokelumne and Tuolumne respectively, and are responsible for any and all adverse impacts on or associated with these rivers. This is not true, there are lots of other users, most of whom predate EBMUD and SFPUC.*

***Introduced Species Are Not Seriously Considered** - Although mentioned sparingly in the ERPP, the current and potential effects of introduced species are ignored. Don't these effects potentially jeopardize the ERPP?*

Editorial Comments

Organization and Format - *The Volume 1 Delta section in particular is very difficult to follow, suggest it be organized like the other sections; i.e. intro, background, vision, processes, objective-target-rationale.*

Action Tables - *The overall ERPP and each Volume 1 zone section should have a table listing the proposed actions. There are a couple of incomplete tables scattered throughout the document.*

Ecosystem Health Report Cards - *I question the value of the report cards, they're never really used to explain or justify anything, their subjective nature may generate endless, non-constructive comment and discussion.*

Hydrographs - *"Historical" hydrographs should specify the period of record. It might be worthwhile to include a projected B2 hydrograph for each CVP stream, representing "current" conditions.*

Land Acquisition - *Each mention of land retirement, acquisition, etc. should be carefully qualified regarding willing sellers, mitigation of third party impacts, etc.*

Flow Changes - *Just about every section in Volume 1 refers to increased instream flows with varying degrees of qualification regarding the source of the additional water. Recommend a single consistent statement be developed regarding increased stream flow. Perhaps something like;*

Flow Management - Opportunities for adjusting seasonal stream flow patterns to benefit fish while maintaining other beneficial water uses will be explored. Opportunities may include acquisition of water rights from willing sellers, or development of supplemental supplies, e.g. conjunctive use, or recycled water programs. CALFED recognizes that individual water rights are established subject to California law. The ERPP does not include any adjudication or involuntary reallocation of water rights.

Objective/Action/Target/Rationale Section Format - *Indentation, headings, spacing, and/or boxes would go a long way toward improving the organization and readability of these sections.*

Other, more specific comments are included in the markup.